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5/29/01

U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION REPORT

I. HEADING

DATE: 29 May 01

SUBJECT: Letts Drop Forge, Detroit, Wayne County, MI

FROM Kurt Grunert, OSC, U.S. EPA, Region 5, ERB, Grosse Ile, MI

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Final Pollution Report (with site layout)

Start Date: 31 Mar 00

II. BACKGROUND

Site No.:	Pending
Delivery Order Number:	Not Applicable
Response Authority:	CERCLA
NPL Status:	Not on NPL
MDEQ Notification:	Yes
Latitude/Longitude:	42°19'03.4" North/ 83°04'31.1" West
Start Date:	31 Mar 00
Completion Date:	Pending

III. SITE INFORMATION

A. Incident Category

Removal Action – Inactive Facility

B. Site Description

1. Site Location

The Letts Drop Forge site is located at 2714 West Jefferson Avenue in Detroit, Wayne County,

Michigan, at latitude 42°19' 03.4" north and longitude 83°04' 31.1" west. The site is located on the northwest corner of the intersection of West Jefferson Avenue and St. Anne Street and is situated in a commercial and industrial area. The 1.5-acre site contains an abandoned steel forging facility that is currently owned by Letts Industries, Inc. The site is bounded by West Jefferson Avenue to the south, St. Anne Street to the east, an unnamed alley to the north, and a vacant parking area to the west. The Detroit River is about 0.25 miles south of the site.

Letts Drop Forge was a metal forging facility that operated from about 1909 until it was closed in 1996. The facility has been vacant since it was closed. The facility has three buildings: two brick buildings and an electrical building located in the north-central portion of the site. In addition, the facility has an inner courtyard and a gated entry that faces south onto West Jefferson Avenue (see Figure 1). A transformer pad is also located directly south of the electrical building.

2. Description of Threat

On 30 Mar 00, the United States Environmental Protection Agency (U.S. EPA) observed evidence of an undetermined, material leaking from the facility's electrical transformers. Further inspection of the site revealed the presence of six high-voltage electrical transformers in the inner courtyard. Four of the transformers had been tipped over and emptied of their contents, while two of the transformers remained upright and intact. During the inspection, U. S. EPA observed oily stains emanating from the transformer pad and continuing southward across the steel yard into the truck loading dock truck well and the City of Detroit storm sewer system located along the curb of West Jefferson Avenue. The well was full of standing water with oil floating on it; the well contained a plugged drain that was plugged not allowing the water to escape.

An emergengy response was initiated by the U. S. EPA on 31 March 00. During this response, the Superfund Technical Assessment and Response Team (START) sampled water from the water in the truck loading dock well, concrete areas in the steel yard, miscellaneous debris, and from stained soil areas in the steel yard and in the well. In addition, oil samples were collected from an electrical switching gear in the electrical building, three capacitors in one of the brick buildings, and the transformers. Laboratory analysis confirmed the presence of polychlorinated biphenyls (PCB) in the transformer oil, soil, cement, and water in the well, electrical switching gears, capacitors, and transformers. The initial investigation also revealed 27 fifty- five gallon drums, six 5-gallon pails, and two aboveground storage tanks (AST) containing lubricating and hydraulic oils.

IV. RESPONSE INFORMATION

A. Situation

1. Current situation:

All potentially responsible party (PRP)-funded cleanup activities were completed at the site as of 18 Jan 01. Excavations have been filled, and the site has been graded. The PRP's cleanup contractor, Enmanco, demobilized its equipment from the site and on-site security was removed as of 28 Feb 01. A final report on the site cleanup was submitted by the PRP (Letts Industries, Inc.) to U. S. EPA on 03 Mar 01.

2. Site activities to date:

Prior to and during site cleanup activities, 24-hour on-site security was provided by the PRP. As part of the security effort, the fencing surrounding the site was repaired and maintained. West Jefferson Avenue between the southwest corner of the site property and St. Anne Street was closed to traffic.

Initial cleanup activities included staging of PCB-containing transformers, capacitors, and switching gear for removal. Once disposal of this equipment had been approved, Dynex transferred the equipment to its facility in Farmington Hills, Michigan, and eventually to the Trans-Cycle Industries facility, which is an U.S. EPA-approved disposal facility.

The approximately 5,800 gallons of water and oil that had collected in the truck loading dock well was removed using a vacuum truck. After the liquid was removed from the well, the remaining sludge was stabilized using an absorbent material and placed in a roll-off box. The well and the contaminated concrete, sidewalk, and street surfaces were washed with an alkaline detergent solution. Wash water and rinseate were properly containerized on site for future treatment. The entire south property line of the site was bermed to prevent storm water from leaving the site. Storm water that collected in the well was containerized for future treatment throughout the cleanup.

Following cleaning, the stained concrete in the truck loading dock well and steel yard, was broken, removed, and loaded into a roll-off box lined with plastic. Any stained soil associated with the concrete was also removed. A total of 288,000 tons of PCB-contaminated concrete and soil was transported to Wayne Disposal, Inc.'s, chemical waste facility in Belleville, Michigan. After all contaminated concrete and soil had been removed from the steel yard, clearance samples were collected. Sample analytical results confirmed that Michigan Department of Environmental Quality (MDEQ) cleanup standards were met; and the excavated areas were backfilled with clean fill, graded, and covered with crushed stone.

All 55-gallon drums, 5-gallon pails, and ASTs at the site were inspected, labeled, inventoried, and staged prior to sampling. Each container was sampled for analysis Resource Conservation and Recovery Act waste characterization parameters. Analytical results indicated that except for two drums and one pail, the containers and tanks contained non-hazardous materials. One drum was determined to contain hazardous waste using the toxicity characteristic leaching procedure for barium. The other two containers were determined to contain waste organic halides. Subsequent screenings of the organic halide-containing waste revealed that it did not contain PCBs; therefore, it was disposed of as nonhazardous waste. The containers with nonhazardous wastes were emptied of their contents and the wastes were consolidated and transported to the Rich Coast Resources (RCR) facility in Dearborn, Michigan for disposal. RCR accepted 732 gallons of non-hazardous waste liquid. The barium-containing hazardous waste was disposed of at the EQ-Michigan Disposal facility from the site in Belleville, Michigan.

During the hazardous waste cleanup activities, eight syringes with needles (sharps) posing a biohazard threat were found on the site property. These items were and placed in a sharps container that was transported off ste and disposed of by Stericycle, Inc.

Following cleaning, wipe samples were collected from the cement sidewalk, on the north side of West Jefferson Avenue and from floor scrapings from underneath storage containers in the hammer room and shear room. Laboratory analytical results indicated the presence of PCBs in

the samples. A total of 50 cubic yards of sidewalk was removed, placed in a roll-off box, and transported to Wayne Disposal, Inc.'s, facility in Belleville, Michigan The PRP replaced the sidewalk that had been removed. Because the analytical results for the wipe samples collected from the floor scrapings also indicated the presence of PCBs, Enmanco scarified the flooring and placed the material removed in a roll-off box along with the removed sidewalk. Samples from the scarified flooring contained PCB concentrations below the cleanup standard set by the Michigan Department of Environmental Quality (MDEQ).

The portion of the storm sewer system immediately surrounding the site as directed by the Detroit Water and Sewer Department system was power-washed. The items power-washed included three manholes, two catch basins, and the connecting sewer lines. All sludge and organic material present in the system were placed in a roll-off box with the PCB-contaminated concrete. Wash water and rinseate were collected in a "frac tank." Power-washings continued until clearance samples indicated no PCB concentrations above MDEQ regulatory levels.

To treat the PCB-contaminated water collected at the site, a system consisting of two filter bags and two drums of granular activated carbon was constructed. Prior to its implementation the system's efficiency was tested. A total of 44,400 gallons of water was then treated and discharged into the City of Detroit storm sewer system under a Special Discharge Authorization Permit. The maximum daily discharge of treated water was 7,200 gallons. The water treatment and discharge activities concluded the site cleanup.

B. Planned Removal Activities
None

C. Next Steps
None

D. Key Issues
None

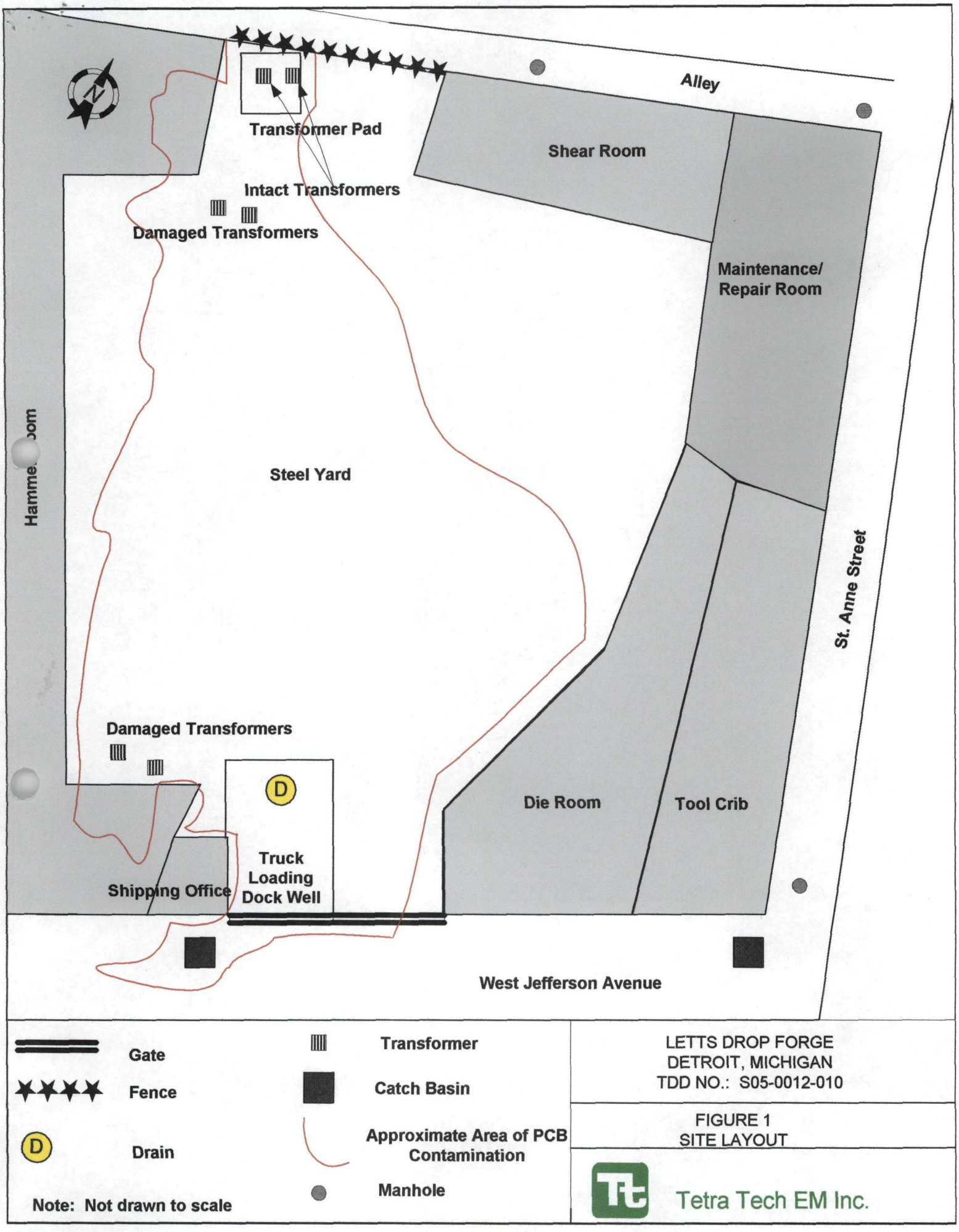
V. COST INFORMATION

The estimated costs as of 29 May 01 are as follows:

START	$5,300
U.S. EPA	$1,000

VI. DISPOSITION OF WASTES

A total of 732 gallons of nonhazardous liquid waste was disposed of by RCR. Wayne Disposal, Inc., accepted 288,000 tons of concrete contaminated with PCBs. A 5-gallon bucket of hazardous waste was sent to EQ-Michigan Disposal. The syringes were disposed of by Stericyle, Inc. The transformers, capacitors, and gear switches that contained PCBs were disposed of by Dynex. A total of 44,400 gallons of water was treated on site, and discharged to the City of Detroit storm sewer system under the a special Discharge Authorization Permit. All used personal protective equipment, contaminated tools, other expendables, and remnants of the water treatment system were sent to Wayne Disposal, Inc., for disposal.


Alley
Transformer Pad
Shear Room
Intact Transformers
Damaged Transformers
Maintenance/
Repair Room
Steel Yard
St. Anne Street
Damaged Transformers
D
Die Room
Tool Crib
Truck
Loading
Dock Well
Shipping Office
West Jefferson Avenue
Gate
Fence
D
Drain
Transformer
Catch Basin
Approximate Area of PCB
Contamination
Manhole
Note: Not drawn to scale
LETTS DROP FORGE
DETROIT, MICHIGAN
TDD NO.: S05-0012-010
FIGURE 1
SITE LAYOUT
Tetra Tech EM Inc.